AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Wesley R. Garland, depose and state as follows:

INTRODUCTION AND BACKGROUND

- 1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been since May 2019. I am currently assigned to the Joint Terrorism Task Force ("JTTF") of the FBI's Boston Division/ Bedford, New Hampshire (NH) office. Before I became a Special Agent, I was a Police Officer in Virginia for nine years. Over my career, I have investigated and assisted investigations of threats, robberies, burglaries, larcenies, assaults, and murders. During my career, my investigations have included the use of various surveillance techniques and the execution of various search, seizure, and arrest warrants.
- 2. The information set forth in this affidavit is based on my personal participation in this investigation, as well as my training and experience, and information received from other law enforcement officers. I have not set forth every detail I or other law enforcement agents know about this investigation but have set forth facts that I believe are sufficient to evaluate probable cause for the issuance of the requested complaint.
- 3. I submit the facts below to establish probable cause to believe that Bradley WORDELL has committed the crime of threatening communications in violation of 18 U.S.C. § 875(c).

RELEVANT LAW

4. Title 18, United States Code, Section 875(c), provides in relevant part that "Whoever transmits in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another, shall be fined under this title or imprisoned not more than five years, or both."

PROBABLE CAUSE

- 5. On January 30, 2024, the FBI was contacted by Merrimack Police regarding a complaint they received a day earlier regarding Bradley WORDELL (hereinafter, "WORDELL"), a 34-year-old male currently residing in Dubai in the United Arab Emirates.
- 6. Specifically, a woman, who I will refer to as "H.C.," contacted Merrimack Police regarding a recent threat that she had received by text message from WORDELL a few days earlier.
- 7. H.C. explained that she understood WORDELL works in Dubai, and that he was planning to visit the New England area between January 31 and February 8. H.C. said WORDELL is the father of her minor child and she has known him for several years. WORDELL and H.C. communicate by text message, with WORDELL utilizing a cellular telephone ending in -3709. For example, in an exchange on January 18, WORDELL requested to be able to send a body armor kit to H.C.'s Merrimack residence so that he could bring it back with him to Dubai on his return. WORDELL's contact information was saved in H.C.'s phone as "Brad."
- 8. In an exchange on January 22, 2024, when WORDELL said he expected to arrive January 30, H.C. replied "Sweet." WORDELL then wrote: "Yea I'm coming to kill you."
- 9. While H.C. initially responded in a seemingly joking matter, referring to their earlier exchange about body armor and, in referencing the threat, how "if that's the case I might not be free." WORDELL then sent a voice memo by text adding that "Yeah, I'm going to blow up a school."
- 10. H.C. reported that she knows WORDELL to maintain several firearms in a storage unit in Nashua, NH, and that WORDELL has been suffering from post-traumatic stress

disorder, or PTSD, and bi-polar disorder. H.C. also reported that she was aware WORDELL had recently gotten angry over another former partner, L.M., engaging in a new romantic relationship. All of these factors led H.C. to take WORDELL's threat more seriously such that she was in fear for her safety and why she contacted Merrimack Police.

- 11. WORDELL provided H.C. with information that he would be on Emirates Air Flight 203 departing from Dubai on January 31 at approximately 2:35 am and landing at JFK International Airport in New York on the morning of January 31. His travel plans further indicated a return flight Emirates Air Flight 238 to Dubai out of Boston Logan Airport on February 8, 2024.
- 12. The FBI confirmed that WORDELL in fact boarded Flight 203 to JFK. As of the writing of this affidavit, the flight is in the air with an anticipated gate arrival time of approximately 8:15 am on January 31. The FBI additionally confirmed WORDELL had the return flight booked for February 8 that he claimed in his message to H.C.

CONCLUSION

13. Based on the foregoing, I submit that there is probable cause to believe that WORDELL made the above-referenced threat in interstate or foreign communication, in violation of 18 U.S.C. § 875(c). I respectfully request that an arrest warrant be issued.

/s/ Wesley R. Garland
Wesley R. Garland, Special Agent
Federal Bureau of Investigation

The affiant appeared before me by telephonic conference on this date pursuant to Fed. R. Crim. P. 4.1 and affirmed under oath the content of this affidavit.

HON. TALESHA SAINT-MARC

United States Magistrate Judge

Jan 30, 2024